

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 18-14594-jkf
Dominic DiVentura d/b/a VRC Philadelphia,	: Chapter 13
Inc. d/b/a Halfway To Concord, Inc.	:
Debtor	:
Federal Home Loan Mortgage Corporation,	:
as Trustee for the benefit of the Freddie Mac	:
Seasoned Loans Structured Transaction	:
Trust, Series 2019-1 c/o Select Portfolio	:
Servicing, Inc.	:
Movant	:
vs.	:
Dominic DiVentura d/b/a VRC Philadelphia,	:
Inc. d/b/a Halfway To Concord, Inc.	:
Debtor/Respondent	:
and	:
Scott F. Waterman, Esquire	:
Trustee/Respondent	:

**OBJECTION TO CONFIRMATION OF THE PLAN**

Federal Home Loan Mortgage Corporation, as Trustee for the benefit of the Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2019-1 c/o Select Portfolio Servicing, Inc. ("Movant"), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Dominic DiVentura d/b/a VRC Philadelphia, Inc. d/b/a Halfway To Concord, Inc. ("Debtor"), as follows:

1. As of the bankruptcy filing date of July 10, 2018, Movant holds a secured Claim against the Debtor's property located at 622 South 3<sup>rd</sup>. Street, Philadelphia, PA 19147.
2. On July 30, 2018, the previous Servicer (Specialized Loan Servicing LLC) filed a Proof of Claim citing a total secured claim in the amount of \$402,524.04 with arrears in the amount of \$6,305.66. The Claim was transferred to Movant via a Transfer of Claim filed on June 19, 2019
3. The Plan currently does not list the secured claim of Movant..
4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Dated: 06/26/2019

Respectfully submitted,

/s/Danielle Boyle-Ebersole, Esquire  
Danielle Boyle-Ebersole, Esquire  
Hladik, Onorato & Federman, LLP  
298 Wissahickon Avenue  
North Wales, PA 19454  
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Inc. d/b/a Halfway To Concord, Inc.	:
Debtor/Respondent	:
and	:
Scott F. Waterman, Esquire	:
Trustee/Respondent	:

**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED  
PLAN TO PARTIES IN INTEREST**

I, Danielle Boyle-Ebersole, Esquire, attorney for Federal Home Loan Mortgage Corporation, as Trustee for the benefit of the Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2019-1 c/o Select Portfolio Servicing, Inc. ("Movant"), certify that I served a copy of the attached Objection to the Plan to the parties below on 06/26/2019:

Dominic DiVentura  
Via First Class Mail  
*Pro Se Debtor*

Scott F. Waterman, Esquire  
Via Electronic Filing  
*Trustee*

Dominic DiVentura  
400-16 S. 2nd Street  
Unit 416A  
Philadelphia, PA 19147  
Via First Class Mail  
*Pro Se Debtor*

Date: 06/26/2019

Respectfully Submitted,  
/s/Danielle Boyle-Ebersole, Esquire  
Danielle Boyle-Ebersole, Esquire  
Hladik, Onorato & Federman, LLP  
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North Wales, PA 19454  
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